COMPLIANCE STATISTICAL SYSTEM PROGRAM

IN THIS APPENDIX

OVERVIEW

The Compliance Examination Data Entry Form (DEF) is the original source document for the entry of all compliance examination data into the Division of Compliance and Consumer Affairs (DCA) computerized Compliance Statistical System (CSS). It should be completed at each compliance and/or CRA examination and visitation as part of the automated Compliance Report of Examination. The DEF is designed to accommodate online data entry by the regional offices.

The data entered on the DEF is in the same order as it appears on the input screens of the CSS:

- Main menu
- Tracking record
- Ratings and hours record
- Violations record

DATA DIRECTORY

Cert No

Bank Certificate Number. Use 5 digit certificate number. Do not use check-digit (- #).

Compliance Exam (Y/N)

Is a compliance examination being conducted at this time? Yes (Y) or No (N). If yes, then a compliance rating must be entered where appropriate. You cannot have a compliance "examination" and a compliance "visitation" on the same date and/or in the same upload spreadsheet.

-- Component Rating (###)

This is the three-digit compliance component rating and must contain values between 1 and 5.

-- Composite Rating (#)

This is the one-digit compliance composite rating and must contain a value between 1 and 5.

Compliance Visit Indicator (Y/N)

Is a compliance visitation being conducted at this time? Yes (Y) or No (N). You can not have a compliance "examination" and a compliance "visitation" on the same date and/or in the same upload spreadsheet.

-- Component Rating

*** Do not enter a component rating for a compliance visitation. Ratings cannot be assigned, or changed, at a compliance visitation.

-- Composite Rating

*** Do not enter a composite rating for a compliance visitation. Ratings cannot be assigned, or changed, at a compliance visitation.

CRA Exam Indicator (Y/N)

Is a CRA examination being conducted at this time? Yes (Y) or No (N). If yes, then a CRA rating must be entered where appropriate. You can not have a CRA "examination" and a CRA "visitation" on the same date and/or in the same upload spreadsheet.

-- Component Rating (#####)

This is the five-digit CRA component rating and must contain values between 1 and 4.

NOTE: For evaluations of institutions after January 1, 1996 using the revised CRA examination procedures, the CRA rating will not include 5 components. In these instances, enter the value 4 as the fifth component.

-- Composite Rating (#)

This is the one-digit CRA composite rating and must contain a value between 1 and 4.

CRA Visit Indicator (Y/N)

Is a CRA visitation being conducted at this time? Yes (Y) or No (N). You can not have a CRA "examination" and a CRA "visitation" on the same date and/or in the same upload spreadsheet. A rating cannot be assigned or changed at a CRA Visitation.

TFL Exam Indicator (Y/N)
>   Is a "Targeted Fair Lending Exam" conducted at this time? Yes (Y) or No (N). This examination and rating has not yet been implemented. Do not use this field until appropriate examination procedures are issued and implemented.

>   -- Component Rating
>   See Compliance Exam Component Rating.

>   -- Composite Rating
>   See Compliance Exam Composite Rating.

Examiner-in-Charge Last Name
>   The last name of the Examiner-in-Charge.

Examiner-in-Charge First Name
>   The first name of the Examiner-in-Charge.

Examiner-in-Charge Mid Init
>   The middle initial of the Examiner-in-Charge. This field can be left blank.

Scheduled Exam Date
>   The date when the examination team is _scheduled_ to arrive at the bank to begin the examination.

Pre-Exam Start Date
>   The date the pre-examination planning for an examination begins.

Pre-Exam End Date
>   The date the pre-examination planning for an examination is complete.

Estimated Compl Date
>   The projected completion date for conclusion of the examination, including report preparation.

Bank Start Date
>   The date the examination team arrives at the institution to begin the on-site examination. This is the "official" examination date. This date should be used to calculate the next examination/visitation date as well as reimbursement calculations.

Bank Exit Date
>   The date the examination team leaves the institution.

Exam Completion Date
>   The date the examination is completed and the report is mailed to the Regional Office.

Number of Examiners
>   The total number of examiners who participated in the examination. Should match examiners listed on page A of the report.

Number of Branches
> The number of branches of the examined institution at the time of the examination. DO NOT include the main office in this count. Include branch offices only.

Bank Exempt from HMDA (Y/N)
> Is the bank exempt from the reporting requirements of the Home Mortgage Disclosure Act ("HMDA")? This field defaults to "N" (No).

FDCPA Applicable (Y/N)
> Is the Fair Debt Collection Practices Act ("FDCPA") applicable to this institution?   This field defaults to "N" (No).

Consumer Reporting Agency (Y/N)
> Is the bank a consumer reporting agency? This field defaults to "N" (No).

Substantive ECOA Violations (Y/N)
> In the examiner's opinion, does the bank have substantive violations of the Equal Credit Opportunity Act ("ECOA")? This field defaults to "N" (No).

Substantive FH Violations (Y/N)
> In the examiner's opinion, does the bank have substantive violations of the Fair Housing Act ("FHA")? This field defaults to "N" (No).

Substantive RESPA Violations (Y/N)
> In the examiner's opinion, does the bank have substantive violations of the Real Estate Settlement Procedures Act ("RESPA")? This field defaults to "N" (No).

Regulation Hours
> On-site examination hours dedicated to review for specific regulations. The following are regulation hour categories:

> *Truth in Lending (On-Site) {TIL}*
> *Consumer Leasing (On-Site) {CL}*
> *Fair Credit Reporting (On-Site) {FCR}*
> *Real Estate Settlement Procedures (On-Site) {RESP}*
> *Flood Insurance (On-Site) {FI}*
> *Truth in Savings (On-Site) {TIS}*
> *Part 329 (On-Site) {329}*
> *Fair Debt Collection Practices (On-Site) {FDCP}*
> *Preservation of Consumer Claims & Defenses (On-Site) {PCCD}*
> *Electronic Fund Transfers (On-Site) {EFT}*
> *Equal Credit Opportunity Act (On-Site) {ECO}*
> *Fair Housing (On-Site) {FH}*
> *Home Mortgage Disclosure Act (On-Site) {HMD}*
> *Community Reinvestment Act (On-Site) {CR}*
> *Expedited Funds Availability (On-Site) {EFA}*
> *Credit Practices Rule (On-Site) {CPR}*
> *Right to Financial Privacy (On-Site) {RFP}*
> *Advertisement of Membership (On-Site) {AM}*

Task Hours
> On-site or Off-site hours dedicated to the completion of certain examination related tasks. The following are task hour

categories, on/off-site designations, and specific definitions:

Other (On-Site or Off-Site) {OTHR}
> All hours that do not fall into another hours capture category. Hours in this field should be minimal.

Training (On-Site or Off-Site) {TRN}
> Any hours devoted to a training activity should be captured here. There should be no duplication of hours between this field and any corresponding regulation or task.

PEP-CRA (Off-Site) {PECR}
> Pre-Examination Planning Hours designated to review of the Community Reinvestment Act.

PEP-Fair Lending (Off-Site) {PEFL}
> Pre-Examination Planning Hours designated to reviewing fair lending regulations other than the Community Reinvestment Act. Specifically, the Fair Housing Act, the Equal Credit Opportunity Act, and the Home Mortgage Disclosure Act.

PEP-Other (Off-Site) {PEOT}
> Pre-Examination Planning Hours designated to the review of all other regulations, excluding the fair lending regulations.

PEP-TASK (Off-Site) {PETK}
> Pre-Examination Planning Hours designated to the administrative review of correspondence, previous examination reports for DCA and DOS, management meetings held before the examination begins, review of UBPR, bank policies and procedures when appropriate, etc.

Report Preparation (On-Site) {REPN}
> All examination hours spent on report preparation while the examination team is at the bank.

Report Preparation (Off-Site) {REPF}
> All examination hours spent on report preparation after the examination team has left the bank.

Prep of Prop Enf Action (On-Site) {PEAN}
> Time spent in preparing a new proposed enforcement action while the examination team is on-site at the bank. Time spent reviewing a "previous" action should be spread under appropriate regulations covered by the enforcement action since this review will be part of the regular examination functions.

Prep of Prop Enf Action (Off-Site) {PEAF}
    Time spent in preparing a new proposed enforcement action. Off-Site Prep of Prop Enf Action occurs at any time other than when the team is on-site from pre-examination planning start date to examination close date. Time spent reviewing a "previous" action should be spread under appropriate regulations covered by the enforcement action since this review will be part of the regular examination functions.

Community Contacts (On-Site) {CNTN}
    Any community contacts which occur while the examination team is on-site at the bank.

Community Contacts (Off-Site) {CNTF}
    Any community contacts which occur after pre-examination planning begins, before the examination team goes on-site at the bank or which occur after the examination team leaves the bank and before the examination close date.

Mtgs W/Management (On-Site) {MTG}
    All examination hours spent in formal meetings with management which occur while the examination team is at the bank after the examination start date and before the examination close date.

Banker Outreach (On-Site) {BKOR}
    On-site time spent advising, consulting and educating bankers.

Total Hours by Regulation & Task
    Total number of Regulation and Task hours. All hours categories, regulation & task, grade, and divisions should balance.

Grade Hours
    Examination hours devoted to this examination by the following Examiner Grade categories:
        GG-15
        GG-14
        GG-13
        GG-12
        GG-11
        GG-09
        GG-07
        GG-05

Total Hours by Grade
    Total number of Grade Hours. All hours categories, regulation & task, grade, and divisions should balance.

Division Hours
    Examination hours contributed by staff from the following Division categories:
        DCA (Division of Compliance and Consumer Affairs)
        DOS (Division of Supervision)

Total Division Hours

Total number of Division Hours. All hours categories, regulation & task, grade, and divisions should balance.

Violation CD

6 digit violation code. The first two digits (##-00-00) of each violation code relate to a specific regulation. The second two digits (00-##-00) relate to a specific cite. The last two digits (00-00-##) relate to cites which have multiple parts. **Also, cite violations on the data entry form that do not have standard text and pre-assigned "specific" codes.** "Uncoded" violation codes are assigned and tracked at the regulation level. The applicable "uncoded violation" codes are noted below:

050000   Truth in Lending
100000   Consumer Leasing
110000   Fair Credit Reporting Act
130000   Real Estate Settlement Procedures Act
150000   Flood Insurance
160000   Truth In Savings
220000   Interest on Deposits - Part 329
240000   Fair Debt Collection Practices Act
260000   Preservation of Consumers' Claims and Defenses
280000   Electronic Funds Transfer
330000   Equal Credit Opportunity
350000   Fair Housing Act
370000   Home Mortgage Disclosure Act
440000   Community Reinvestment Act
500000   Expedited Funds Availability Act
540000   Credit Practices Rule
770000   Right to Financial Privacy
800000   Advertisement of Membership - Part 328

Identified by Bank Management ("BR" - Bank Reported) (Y/N)?

Did bank management identify the violation? "**Y**" or yes, indicates the violation was identified by bank management. "**N**" or no, indicates the examiner identified the violation.

Freq

Frequency of Violation description:
Enter:
R for *RANDOM* –Random infractions are defined as isolated, infrequent, sporadic or irregular deficiencies.

P for *PATTERN* – A volume of violations, stemming from a common cause, sufficient to indicate a breakdown in established procedures. Isolated, unrelated or accidental occurrences will not constitute a pattern or practice. Recurring, intentional, regular, usual, deliberate practices will almost always constitute a pattern or practice. The entire set of circumstances must be considered at each institution when assessing whether a pattern or practice is present.

S for   ***SYSTEM-WIDE*** – A system-wide violation results from established procedures or computational errors incorporated into the routine operations of a majority of the offices, departments, or employees of the financial institution.

Cause

Cause of the Violation description:

Enter:

10 for   ***Inadvertent Errors*** – Unintentional mistakes despite adequate resources, capabilities, and knowledge on the part of the financial institution.

20 for   ***Misinterpretation*** – While financial institution management has taken steps to become knowledgeable of and familiar with the laws and regulations, the applicable requirement(s) has been incorrectly comprehended or interpreted.

30 for   ***Training*** – The individual or department responsible for compliance has not been sufficiently advised or informed of the responsibilities, despite the existence of adequate policies and procedures.

40 for   ***Procedures*** – Adequate internal operating procedures to ensure ongoing compliance have not been developed or implemented, despite the financial institution's awareness of the regulatory requirements.

50 for   ***Unfamiliarity*** – Management of the financial institution has not taken steps to become adequately versed or acquainted with the requirements of the applicable regulation(s).

60 for   ***Willful Noncompliance*** – A blatant disregard for compliance with the applicable regulation despite the resources and capabilities of the financial institution's personnel.

Severity

Severity of the Violation description:

Enter:

SS for   ***Significant Substantive*** – Violations of a specific regulation which individually or collectively:
- Impose immediate (current examination) supervisory requirements or corrective action on the financial institution;
- Have monetary repercussions on the financial institution or to identified consumer(s);
- Are willful in nature; or
- Significantly affect the availability or accuracy of publicly accessible data.

SO for   ***Significant Other*** – Violations that may be considered significant, depending on the circumstances in which they occur. They may be described as having one or more of the following characteristics:
- Violations that appeared in the significant violations section at the previous examination and are repeated in exactly the same manner at the current examination. If the repeat violation is determined to be willful, it should be classified as substantive. Isolated repeat violations are not necessarily significant;
- Numerous violations affecting one regulatory area indicating a breakdown in training, internal controls, audit procedures, or management oversight for that area; or
- Violations that result from a routine practice or that impact a large number of customers.

VO for   ***Other Violations*** – Infrequent, sporadic or irregular violations that neither individually, or collectively, represent serious concern for the financial institution but require corrective action where appropriate. Violations which do not fit the description of <u>Significant</u> violations should be included in this definition.

Disp

Disposition of the Violation description:

Enter:

CI for   ***Corrective Measures Implemented*** – A violation cited during the examination has been corrected through implementation of new or revised procedures initiated to correct the cited infraction or prevent its recurrence. This category is appropriate when a financial institution's management responds to an identified violation through specific actions expected to prevent the recurrence of the identified violation.

OV for   ***Outstanding Violation*** – A violation or cause of violation that remains uncorrected.

Refer to Instructions for the Compliance Report of Examination, Transmittal Number DCA-96-021 for additional information on examiner use of the enhanced violation coding system.

INTRODUCTION

Presented below are the detailed steps to enter data into the automated CSS Data Entry Form ("DEF"). **All entry occurs in column C items, except violation information. Violation information is captured in columns C through O. Dividing columns separate violation descriptives. There are also basic error prompts throughout the spreadsheet.** If you attempt to enter data in a non-entry cell, (such as columns A, B, E, F, etc.), you will receive a message that the cell is **protected**; press the **<ESCAPE>** key to resume processing.

Notice that column B contains numbers that are presented sequentially from the top of the form. These numbers uniquely identify each data entry field in the CSS Upload process. Column B is protected; do not try to modify or delete any of the entries in column B.

Several edits have been built into the DEF. When data is entered into a cell which has edit criteria associated with it, an invalid entry will cause an "error note" to appear in column E next to the invalid entry. In most cases, the "error note" will simply display "ERR". Correct the erroneous entry and the "error note" will disappear.

The basic spreadsheet used to enter CSS data will be referred to as "UPLDFORM" (for "Upload Form"). To retrieve the first spreadsheet for entering data, enter "UPLDFORM" at the filename prompt (see Spreadsheet Retrieval).

**   At the end of this document, a special list of **Reminders** is provided. These are key points about the spreadsheet processing that are critical to success. Although each data entry and file processing task are covered in detail in the following pages, **Reminders** simply reinforce the importance of adhering to all specified procedures.

DATA ENTRY

1.   Enter Location of Files.

      Each machine used for storage of CSS Examination/Visitation data has a standard directory, C:\OFFICE\WPWIN\EXAMLIB. You may always use this directory for saving your spreadsheet (for example, worksheet files) and print files; however, it is recommended that the examination-specific spreadsheet be saved in the same location as other examination documents. When the spreadsheet is first retrieved, the default directory is pre-set to **C:\OFFICE\WPWIN\EXAMLIB.**

      To reset your Default Directory to one other than the standard C:\OFFICE\WPWIN\EXAMLIB, follow the steps presented below:

      a.   Place your cursor in column C next to the prompt   "SET DIRECTORY TO:" and enter a valid directory. The format of the Default Directory must include the Drive Identifier, followed by a "backslash" ("\"), followed by each directory within which your default directory resides as a sub-directory. For example, if data files are to reside in a directory on the A: drive called "123DATA", the Default Directory name would be "A:\123DATA". If the directory is a sub-directory within "123DATA" called "UPLDDATA", the entry for Default Directory would be "A:\123DATA\UPLDDATA" (each directory is distinguished from the next lower sub-directory by a "backslash".)

      b.   Press the <ENTER> key. The default directory name appears in Column C at the top of the spreadsheet. Make sure to visually verify that the correct directory appears on the spreadsheet.

2.   Enter a 7-character Worksheet File Name.

       A valid worksheet filename is seven characters in length. The first two characters are always "UL" followed by a 5 digit cert. For example, UL00039, UL20048, UL30000, or UL00005.

          ** Do not enter a file extension as part of the worksheet file name.

3.   Enter a 7-character Print File Name.

       A valid Print filename is seven characters in length and <u>should be same as the Worksheet file name</u>. The first two characters are always "UL" followed by a five digit cert. For example, UL00039, UL20048, UL30000, or UL00005

          ** Do not enter a file extension as part of the print file name.

4.   Enter CERT No.
      --   Use five digit certificate number.
      --   Do not use check-digit (- #).

5.   Enter Compliance Exam Indicator.

--   Must be "Y" or "N". If anything other than "Y/N" entered, "ERR" is displayed.

--   May not enter "Y" if Compliance Visitation or TFL Exam Indicator is also "Y" (displays 'ERR').

6.   Enter 3-digit Compliance Exam Component Ratings.
       (example: "212")

--   No editing done.

7.   Enter 1-digit Compliance Exam Composite Rating.
           (example: "1")

--   No editing done.

8.   Enter Compliance Visit Indicator.

--   Must be "Y" or "N". If anything other than "Y/N" entered, "ERR" is displayed.

--   May not enter "Y" if Compliance Exam or TFL Exam Indicator is also "Y" (displays 'ERR').

9.   Enter 3-digit Compliance Visitation Component Rating.
       (example: "221")

--   No editing done.

10. Enter 1-digit Compliance Visitation Composite Rating
        (example: "2")

--   No editing done.

11. Enter CRA Exam Indicator.

--   Must be "Y" or "N". If anything other than "Y/N" entered, "ERR" is displayed.

--   May not enter "Y" if CRA Visitation Indicator is also "Y" (displays "ERR").

12. Enter 5-digit CRA Exam Component Ratings
        (example: "32132")

--   No editing done.

13. Enter 1-digit CRA Exam Composite Rating.
    (example: "2")

    -- No editing done.

14. Enter CRA Visit Indicator.

    -- Must be "Y" or "N". If anything other than "Y/N" entered, "ERR" is displayed.

    -- May not enter "Y" if CRA Exam Indicator is also "Y" (displays "ERR").

15. Enter TFL Exam Indicator.

    -- Must be "Y" or "N". If anything other than "Y/N" entered, "ERR" is displayed.

    -- May not enter "Y" if Compliance Visitation Indicator <u>or</u> Compliance Examination Indicator is also "Y" (displays 'ERR').

16. Enter 3-digit TFL Exam Component Ratings.
    (example: "132")

    -- No editing done.

17. Enter 1-digit TFL Exam Composite Rating.
    (example: "2")

    -- No editing done.

18. Enter Examiner-in-Charge Last Name.

19. Enter Examiner-in-Charge First Name.

20. Enter Examiner-in-Charge Mid Initial.

NOTE: ALL THE FOLLOWING DATES must be preceded by an apostrophe (or single quote), double quote, or caret. This is required to let Lotus know a date and not an arithmetic expression is being issued (for example, '09/01/94)

21. Enter Scheduled Exam Date in MM/DD/YY or MM-DD-YY format.
    -- No editing done on date; edit will be initiated on the mainframe.

22. Enter Pre-Exam Start Date in MM/DD/YY or MM-DD-YY format.
    -- No editing done on date; edit will be initiated on the mainframe.

23. Enter Pre-Exam End Date in MM/DD/YY or MM-DD-YY format.
    -- No editing done on date; edit will be initiated on the mainframe.

24. Enter Estimated Completion Date in MM/DD/YY or MM-DD-YY format.
    -- No editing done on date; edit will be initiated on the mainframe.

25. Enter Bank Start Date in MM/DD/YY or MM-DD-YY format.

    --   No editing done on date; edit will be initiated on the mainframe.

26. Enter Bank Exit Date in MM/DD/YY or MM-DD-YY format.
    --   No editing done on date; edit will be initiated on the mainframe.

27. Enter Exam Completion Date in MM/DD/YY or MM-DD-YY format.
    --   No editing done on date; edit will be initiated on the mainframe.

28. Enter Number of Examiners.

29. Enter Number of Branches.

30. Enter Bank Exempt From HMDA indicator.
    --   If entered, must be "Y" or "N"; otherwise "ERR" is displayed.

31. Enter FDCPA Applicable indicator.
    --   If entered, must be "Y" or "N"; otherwise "ERR" is displayed.

32. Enter Consumer Reporting Agency indicator.
    --   If entered, must be "Y" or "N"; otherwise "ERR" is displayed.

33. Enter Substantive ECOA Violations indicator.
    --   If entered, must be "Y" or "N"; otherwise "ERR" is displayed.

34. Enter Substantive FH Violations indicator.
    --   If entered, must be "Y" or "N"; otherwise "ERR" is displayed.

35. Enter Substantive RESPA Violations indicator.
    --   If entered, must be "Y" or "N", otherwise "ERR" is displayed.

36. Enter Total Number of Examination Hours beside each applicable Regulation and Task Hours Category.

    --   Enter number of hours beside each category. When the entry for Regulation Hours and Task Hours has been completed, the Error Note beside the "Total Hours By Regulation & Task" will indicate that the Hours are not equal. This is displayed because the matching hours by Grade Level has not yet been entered.

    --   If "Community Reinvestment Act" (CR) hours are entered, but the CRA Examination Indicator is set to "N", an error note will appear next to the "CR" hours entry. Also if the CRA Examination Indicator is set to "Y" and no "CR" hours are entered, an error note will appear next to the "CR" hours entry.

37. Enter Total Number of Examination Hours beside each applicable Grade Category.

     --   Enter number of hours beside each category. When the entries for Hours has been completed an Error Note beside
          the "Total Hours By Grade" will indicate that the hours are not equal if they do not match the "Total Hours by
          Regulation & Task." This condition must be corrected or the uploaded spreadsheet will be rejected by the
          mainframe edit programs.

     --   There are no edits on the individual hours entered. If letters have been entered instead of numbers, Lotus treats
          them as non-numerics and doesn't add them to the totals. The mainframe edits, however, will examine each non-
          space entry and reject non-numeric data entered in the hours field.

     --   If "0" (zero) is entered for individual hours, the mainframe edit program will bypass the entry.

38. Enter Total Number of Examination Hours beside each applicable Division Category (DOS and DCA).

39. Enter Violation Code and related Violation Code Descriptives:
          Identified by Bank Management?
          Frequency.
          Cause.
          Severity.
          Disposition.

     --   Enter Violation Code in Column C. The entry must be a valid Violation Code **(tab down to row 238 to see Valid
          Violation Codes.)** If an incorrect Violation Code is entered, an "ERR" will be displayed.

     --   Enter the "Identified by Bank Management" descriptive value in Column G, next to the Violation Code. The user
          should enter a valid value (**See the Data Directory section of these instructions for valid violation code
          descriptive values**). Invalid entries will be rejected during the mainframe edit process.

     --   Enter the "frequency" descriptive value in Column I, next to the Violation Code. The user should enter a valid
          value (**See the Data Directory section of these instructions for valid violation code descriptive values**).
          Invalid entries will be rejected during the mainframe edit process.

     --   Enter the "cause" descriptive value in Column K, next to the Violation Code. The user should enter a valid value
          (**See the Data Directory section of these instructions for valid violation code descriptive values**). Invalid
          entries will be rejected during the mainframe edit process.

     --   Enter the "severity" (intensity) descriptive value in Column M, next to the Violation Code. The user should enter a
          valid value (**See the Data Directory section of these instructions for valid violation code descriptive values**).
          Invalid entries will be rejected during the mainframe edit process.

     --   Enter the "disposition" descriptive value in Column O, next to the Violation Code. The user should enter a valid
          value (**See the Data Directory section of these instructions for valid violation code descriptive values**).
          Invalid entries will be rejected during the mainframe edit process.

SAVE PROCESS

When working with the CSS Examination/Visitation Data Entry Form, remember that you are working with two types of files: Spreadsheets and "Print" files. When entering and manipulating data with the "cell pointer" you are working with spreadsheet information; this information is easy to update and revise. When the spreadsheet data entry processing has been completed both the spreadsheet and print files will be saved using the file names previously specified (See Data Entry for File Names).

The CSS Examination/Visitation data entry form contains a macro that allows saving both the spreadsheet and print files with a minimum of keystrokes.

1. A) ***For DOS Versions of Lotus 1-2-3***

    Press the **<ALT>** and **<F3>** keys simultaneously to display a list of macros at the top of your spreadsheet. Press the <**RIGHT ARROW>** key until the **"\SAVE"** macro has been reached.

    B) ***For WINDOWS Versions of Lotus 1-2-3***

    Click on:
        "**Tools**"
        "**Macros**"
        "**Run**"

2. Select the "**SAVE**" macro and execute it by pressing the **<ENTER>** key for DOS or **double clicking** for WINDOWS; spreadsheet and print files will be saved.

UPDATE PROCESS

The CSS Examination/Visitation data entry form contains a macro that allows the update of both the spreadsheet and print files with a minimum of keystrokes. The macro will use the file names specified in the spreadsheet (See Data Entry for File Names).

1. A) ***For DOS Versions of Lotus 1-2-3***

    Press the **<ALT>** and **<F3>** keys simultaneously to display a list of macros at the top of your spreadsheet. Press the <**RIGHT ARROW>** key until the **"\UPDATE"** macro is reached.

    B) ***For WINDOWS Versions of Lotus 1-2-3***

    Click on:
        "**Tools**"
        "**Macros**"
        "**Run**"

2. Select the "**UPDATE**" macro and execute it by pressing the **<ENTER>** key for DOS or **double clicking** for WINDOWS; the spreadsheet and print files will be updated.

PRINT PROCESS

1. Four macros exist for printing various portions of the spreadsheet. Select the desired macro by placing the cursor on the macro name and pressing the **<ENTER>** key for DOS or **double clicking** for WINDOWS.

    - "**\PRNTEXAM**"; select this macro to print the Examination data portion of the spreadsheet.

    - "**\PRNTHOUR**"; select this macro to print the Hours portion of the spreadsheet.

    - "**\PRNTVIOL**"; select this macro to print the Violations portion of the spreadsheet. Since the Violations portion contains a variable number of rows, depending on the number of violations recorded for the particular Examination/Visitation, you are prompted to enter the range that should be printed. Enter the range (for example, A80..A90) and press the <ENTER> key.

    - "**\PRNTALL**"; select this macro to print the entire spreadsheet. The printed output will appear in three sections; Examination data, Hours data and Violations data.

LOTUS BASICS

Prior to using the Lotus 1-2-3 (hereafter referred to as "Lotus") Spreadsheet for Examination/Visitation data entry processing, it is required that the user know basic conventions and features of the Lotus User Interface. The overview provided below focuses only on those Lotus skills necessary to use the Compliance Statistical System (CSS) Examination/Visitation data entry form. Refer to the Lotus Users Guide or any of a host of third-party publications for more in-depth information about the software and its many features.

The CSS Data Entry form used to enter Examination/Visitation data is a Lotus spreadsheet that has been formatted specifically for capturing data used by the mainframe CSS system. The user will be required to enter data in the appropriate fields provided on the spreadsheet. When data input has been completed, you will save the information using a special macro.   Specific instructions on how to do this are provided later in this Appendix.

SPREADSHEET RETRIEVAL

After starting the Lotus program, a screen in the format of a blank spreadsheet is presented. Instructions are provided here for *DOS* versions for *Lotus 1-2-3*. These will also function for *WINDOWS* based version of *Lotus 1-2-3*.

1. **Enter a "/" (slash).** At the top of the spreadsheet, two rows of commands will appear. The top row contains the highest level of the Lotus Menu Command structure. The bottom row contains the first level of commands associated with each top level command (or menu option.) The commands displayed on the bottom row are always associated with the top level command on which the cursor is resting. For example, when you entered the "/", the commands appear with the cursor resting on the "Worksheet" option; the second row of commands are all associated with the "Worksheet" main option. By moving the cursor along the top row (press the <RIGHT ARROW> key), the bottom row options change as the cursor rests on a new Main option or command.

2. **Move the cursor to the "File" Menu Option. Press the <ENTER> key**. A new set of commands will appear on the top row; these are the first level of sub-commands associated with the "File" Option. The second row now contains an explanation of the sub-command on which the cursor presently rests. **For example, the cursor now rests on the "Retrieve" command;** the second row contains an explanation of the "Retrieve" command.

3. **Press the <ENTER> key.** The command line now presents the caption "Name of file to retrieve:" followed by a default directory. The cursor is also blinking after the directory; this is the prompt to enter the filename. **Enter the name of the file to be retrieved; (for example,
    "C:\OFFICE\WPWIN\EXAMLIB\COMPL\REPORT\UPLDFORM.WK1")
    and press the <ENTER> key.**

SPREADSHEET BASICS

1. Once the spreadsheet to be used as the CSS Examination/Visitation data entry form has been retrieved, begin entering data. The basis of all spreadsheet data entry is through the "cell pointer". The "cell pointer" is the rectangle that highlights an entire cell within the spreadsheet. Only enter data into the spreadsheet at the position where the "cell pointer" is located.

2. Cell pointer movement is accomplished through several different methods. The basic methods to move around the CSS Examination/Visitation data entry form are listed below.

    a) Arrow keys. Press the appropriate Arrow key for moving the cell pointer up, down, left or right.

    b) HOME key. Press the <HOME> key to position the cell pointer at position A1, which is the upper left-hand corner of the form.

    c) PGUP and PGDN keys. Press the <PGUP> key to move the cell pointer up one screen. Press the <PGDN> key to move the cell pointer down one screen.

3.   Data entry within a cell is accomplished in one of two ways:

    a)   Enter data within the desired cell and press one of the Arrow keys to move to another cell; the data you just entered will remain in the cell; or

    b)   Enter data within the desired cell and press the <ENTER> key; the data will appear in the cell (the "cell pointer" will remain on the cell also.)

EXECUTING MACRO COMMAND FILES

Lotus allows users and developers to build files that contain strings of standard keyboard and Macro Language commands. These files, called Macro Command Files, (or, "macros") can be executed by the spreadsheet user. Macros are usually built to automate a string of standard commands by entering a series of keystrokes. For example, attempting to save and print a spreadsheet file requires invoking several commands and sub-commands or options; however, a "macro" could be created to mimic the keyboard entry of all of the usual commands needed to save and print spreadsheets. Once such a macro is completed, a user would only need to execute the macro and enter the name of the file to be saved/printed; the macro commands would do the rest.

Throughout this section, you will be referred to several "macros" useful for processing and completing work. CSS Lotus macros are executed in a specific series of steps. Whenever this document directs the user to execute a "macro", follow the generic procedures outlined below.

A.   **For DOS Versions of Lotus 1-2-3**

    1)   Press the <ALT> and <F3> keys simultaneously. The menu line at the top of the spreadsheet will display the names of the available macro command files. "Executable" macros are prefixed by a "backslash" ("\"). To see the names of macros which could not fit in the space available on the menu line, press the <RIGHT ARROW> key until reaching the last macro on the right side of the menu line. Press this key again, and a new list of macro names will appear. (Alternately, by initially pressing the <LEFT ARROW> key, the last macro in the total list of available macros is presented. Continue to press the <LEFT ARROW> key until the desired macro name is reached.)

    2.   Place the cursor on the macro to be executed and press the <ENTER> key. The macro will begin executing. Some macros may prompt for additional data (file name, directory name, etc.) Others will not and need no additional input to complete their tasks.

B.   **For WINDOWS Versions of Lotus 1-2-3**

    1)   Click on:
        "**Tools**".
        "**Macros**".
        "**Run**".

    2)   Scroll through list of available macros, double clicking on the desired macro.

If a macro terminates execution abnormally, you will see an ERROR Message Box appear on your screen, overlaying your spreadsheet. If the message in the ERROR Message Box indicates that the user should press the <ESC> key to end the macro execution, do so. If the message does not indicate that the user should press the <ESC>, simultaneously press the <CTRL> and <BREAK> or <CTRL> and <BRK> keys. This will terminate the macro; macros can then be re-executed at a later time.

REMINDERS

1. The standard Default Directory is set to **C:\OFFICE\WPWIN\EXAMLIB**.

2. When specifying file names, do not include the file extension. Also, specify the same names for both worksheet and print files.

3. For each Report of Examination, execute \SAVE only once to save the file. Use the \UPDATE macro to update your file.

4. When entering the five digit certificate number, do not use check-digit. Lotus will interpret the dash '-' as a minus symbol and subtract the check digit from certificate number.

5. The CSS Examination/Visitation Data Entry upload form is **UPLDFORM.WK1.** This file is write-protected.

6. If any errors or unexpected responses occur while running spreadsheet macros, press the **<CTRL>** and **<BREAK>** keys simultaneously to exit the macro function.

7. If data is entered in the wrong cell, **do not use the Lotus "move" command** to transfer data to the correct cell; erase data from the incorrect cell and re-type it in the appropriate location.

8. Retrieve the upload form **UPLDFORM.WK1** from directory **C:\OFFICE\WPWIN\EXAMLIB\COMPL\MISC**.

9. **Do not "unprotect" any protected cells.** If changes are needed to protected areas, please contact the Analysis and Policy Review Section at the Washington Office.

VERSION 3.0 RELEASE NOTES

- Improved \SAVE and \UPDATE macros:
  The new macros will not prompt you for file names. You must enter the worksheet and print file names as part of the Data Entry.

- New naming standards for WORKSHEET and PRINT file names:
  You must enter a valid 7 character worksheet and print file names as part of the Data Entry. These are used in the \SAVE and \UPDATE macros.

- Removal of BSA:
  BSA is no longer tracked in the Compliance Statistical System; therefore, all references to BSA are removed.

- New Items Being Tracked :
  *** Refer to Data Directory heading for definitions*

  Pre-Exam Start Date
  Pre-Exam End Date
  Bank Start Date
  Bank Exit Date
  Number of Branches
  RESPA Violations Indicator
  PEP-CRA Hours
  PEP-Fair Lending Hours
  PEP-Other Hours
  PEP-Task Hours
  Prep of Prop Enf Action Hours
  DOS Hours
  DCA Hours

- Updates to the Compliance/CRA Violation Code System have been incorporated, including the ability to track "uncoded" violations.
  *** Refer to Data Directory heading for definitions*

```
                SET DIRECTORY TO  :   C:\OFFICE\WPWIN\E
      MAKE WORKSHEET FILE NAME    :
             MAKE PRINT FILE NAME :
                                      DATA ENTRY
CERT NO.                           1
COMPLIANCE EXAM (Y/N)              2   N
- COMPONENT RATING  (###)          3
- COMPOSITE RATING  (#)            4


COMPLIANCE VISIT (Y/N)             5   N
- COMPONENT RATING  (###)          6
- COMPOSITE RATING  (#)            7


CRA EXAM  (Y/N)                    8   N
- COMPONENT RATING  (#####)        9
- COMPOSITE RATING  (#)           10


CRA VISIT  (Y/N)                  11   N


TFL EXAM  (Y/N)                   12   N
- COMPONENT RATING  (###)         13
- COMPOSITE RATING  (#)           14



        ---------------
EXAMINER IN CHARGE - LAST NAME    16
EXAMINER IN CHARGE - FIRST NAME   17
EXAMINER IN CHARGE - MID INIT     18
SCHEDULED EXAM DATE - MM/DD/YY     19
PRE-EXAM START DATE - MM/DD/YY     20
PRE EXAM END DATE - MM/DD/YY  21
ESTIMATED COMPL DATE - MM/DD/YY   22
BANK START DATE - MM/DD/YY         23
BANK EXIT DATE - MM/DD/YY          24
EXAM COMPLETION DATE - MM/DD/YY   25
NO OF EXAMINERS                   26
NO OF BRANCHES                    27
BANK EXMPT FROM HMDA (Y/N)        35   N
FDCPA APPLICABLE (Y/N)            36   N
CONSUMER RPT AGENCY (Y/N)         37   N
SUBSTANTIVE ECOA VIOLATIONS (Y/N) 38   N
SUBSTANTIVE FH VIOLATIONS (Y/N)   39   N
SUBSTANTIVE RESPA VIOLATIONS (Y/N) 40  N
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```

```
          REGULATION HOURS:                                :
TRUTH IN LENDING                           51               :
CONSUMER LEASING                           52               :
FAIR CREDIT REPORTING                      53               :
REAL ESTATE SETTLEMENT PROCEDURES          54               :
FLOOD INSURANCE                            55               :
TRUTH IN SAVINGS                           56               :
PART 329                                   57               :
FAIR DEBT COLLECTION PROCEDURES            58               :
PRES OF CONS CLAIMS & DEFENSES             59               :
ELECTRONIC FUNDS TRANSFERS                 60               :
EQUAL CREDIT OPPORTUNITY                   61               :
FAIR HOUSING                               62               :
HOME MORTGAGE DISCLOSURE ACT               63               :
COMMUNITY REINVESTMENT ACT          64                  :
EXPEDITED FUNDS AVAILABILITY        65                  :
CREDIT PRACTICES RULE                      66               :
RIGHT TO FINANCIAL PRIVACY                 68               :
ADVERTISEMENT OF MEMBERSHIP                69               :
                                                           :
TASK HOURS:                                                :
OTHER                                      70               :
TRAINING                                   71               :
PEP-CRA          (OFF-SITE)                72               :
PEP-FAIR LENDING      (OFF-SITE)           73               :
PEP-OTHER         (OFF-SITE)               74               :
PEP-TASKS         (OFF-SITE)               75               :
REPORT PREPARATION    (ON-SITE)            76               :
REPORT PREPARATION    (OFF-SITE)           77               :
PREP OF PROP ENF ACTION (ON-SITE)          78               :
PREP OF PROP ENF ACTION (OFF-SITE)         79               :
COMMUNITY CONTACTS    (ON-SITE)            80               :
COMMUNITY CONTACTS    (OFF-SITE)           81               :
MTGS W/MANAGEMENT     (ON-SITE)            82               :
BANKER OUTREACH       (ON-SITE)            83               :
                                                           :
   TOTAL HOURS BY REGULATION & TASK        84          0     :
       ---------------                                      :
G-15                                       85               :
G-14                                       86               :
G-13                                       87               :
G-12                                       88               :
G-11                                       89               :
G-09                                       90               :
G-07                                       91               :
G-05                                       92               :
                                                           :
   TOTAL HOURS BY GRADE                     93          0     :
       ---------------                                      :
DCA                                        94               :
DOS                                        95               :
                                                           :
TOTAL HOURS BY DIVISION                     0               :
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```

SIX-DIGIT VIOLATION CODE	: VC : ERR	: ID BY : BANK (Y/N)	: FREQ : R,P, S	: CAUSE : 10-60	: SEVERITY : SS/SO/VO	: DISP : CI/OV	:
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INSTRUCTIONS FOR UPLOADING

OVERVIEW – MAINFRAME

The Compliance Statistical System (CSS) data entry process has been modified to include a new option for automatic data insertion into the mainframe database. The automatic data insertion option, referred to as the CSS Upload process, has been integrated into the standard CSS online processing that is currently in place. This section provides instructions on how to use the Upload feature of the CSS.

PROCESS START-UP

MAINFRAME SIGN ON

1. Sign on to the FDIC mainframe system by entering your ACF2 User ID and Password.

2. You are prompted to enter the Region in which you will be working. Select CICSPROD. Press the <ENTER> key.

3. You are now presented with a listing of systems, subsystems and program products/environments, from which you must make your selection. Select Option 2, (BITS) and press the <ENTER> key.

4. You are next presented with the BITS menu. Select Option 2, (Supervisory Analysis System; or "SAS") and press the <ENTER> key.

5. There are three different paths to take to arrive at the CSS Upload Process screen:

    a) The first is to select option "10" from the SAS Main Menu. Option "10" is entitled "Compliance Statistical System Upload". When you select option "10", you are placed directly in the CSS Upload Process screen.

    b) A second path to the CSS Upload Process can be taken by entering the name of the CSS Upload Report("CSSUPLD") on the SAS Main Menu Command Line. Entering the Report Name on the Command Line also places you directly in the CSS Upload Process.

    c) The third path is taken by selecting the Compliance Statistical System (CSS) option ("8") from the SAS Menu. When you select option "8", you are placed in the CSS Main Menu screen. (You can also reach the CSS Main Menu by entering "CSSM1" on the SAS Main Menu Command Line.) When the CSS Main Menu is displayed, the Program Function (PF) Key display line on the bottom of the screen shows "6=CSS Upload"; press <PF6> to go directly to the CSS Upload Process screen.

6. The CSS Upload Process screen prompts you for two pieces of information: the name of the print file that contains your spreadsheet data; and the date the exam was received in the Regional Office.

    a) Enter the name of the "print" file. This field is required. It must contain the accurate drive, directory (if you use a directory structure to store your Lotus files) and file name specification that the Upload software utility will use to find your file. If you make a mistake when entering the file name, press the <Backspace> key to return to the beginning of the field or press the <PF2> key to clear the entry (this clears all entries on the screen.)

    b)   Enter the date received in Regional Office (if applicable). It must be entered in MM/DD/YY format, as prompted by the screen display.

7.   Press the <ENTER> key when the input data is correct. The CSS Upload Process screen is replaced by the IDEAL Sign-off screen, followed by the Upload Utility screen. This screen presents upload information to the user as the data transfer is in process; you will see, for example, a digital clock advancing in the right-hand corner of this display. The Upload Utility software also briefly displays the status of the upload and whether it successfully located and read your print file.

    The computer screen will go blank for several seconds as the CSS edit programs execute. The upload attempt is completed when the CSS Upload Process screen is re-displayed.

8.   The CSS Upload Process Screen will return in one of two conditions. First, if the upload attempt was successful, the error message portion of the panel will be blank; at the top of the screen, a message will indicate the upload was successful (the Cert and Exam Date will be shown).

    Second, if the upload is unsuccessful, a list of error messages will be displayed. At the top of the screen, a message will indicate the upload was unsuccessful. You can either enter the name of the next file you wish to upload or press the appropriate PF key to return to another location in the system.

9.   Once the upload is successful, an option to print a Regional Office tracking sheet is given. Printing this sheet provides the ability to track the report through the review process and also for complete CSS data validation. It is suggested that this form be used for every examination report received and logged into the CSS. This report can also be printed from the CSS Main Menu, Option F – Reporting, Option K – Tracking Sheet.

**FDIC LAW,
REGULATIONS,
& RELATED
ACTS**

Applicable Rules   None

_____

**Advisory
Opinions**   None

_____

**Statements of
Policy**   None

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**DCA
MEMORANDA**   Compliance Statistical System: Violation Code Directory, Transmittal No. DCA-96-025, dated 3/18/96

Instructions for the Compliance Report of Examination, Transmittal No. DCA-96-021, dated 2/23/96

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**FINANCIAL
INSTITUTION
LETTERS (FIL)**   None

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